



1095 Avenue of the Americas  
New York, NY 10036-6797  
+1 212 698 3500 Main  
+1 212 698 3599 Fax  
[www.dechert.com](http://www.dechert.com)

---

JOHN BIANCAMANO

[john.biancamano@dechert.com](mailto:john.biancamano@dechert.com)  
+1 212 649 8744 Direct  
+1 212 314 0060 Fax

August 16, 2016

**VIA ECF**

The Honorable Lois Bloom  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: *Ysmael Maldonado v. The City of New York, et al.*, No. 15-cv-6619 (E.D.N.Y.)

Your Honor:

We are pro bono counsel for the plaintiff in this action. We write to request an extension of the time to file an Amended Complaint. Counsel for the Defendants consents to this extension.

Shortly after we began to represent Mr. Maldonado, the lead associate on this case accepted a new job. As a result, on July 19, 2016, I joined the team representing Mr. Maldonado and we requested a 30-day extension of the deadline for filing an Amended Complaint. The Court granted that request on July 20, 2016. The deadline is currently August 19, 2016. We have made no other requests for an extension.

We are requesting an additional 30-day extension to ensure that we have time to fully investigate the issues raised in Mr. Maldonado's pro se complaint. We have met with Mr. Maldonado several times, and we are in the process of retaining a dermatologist to evaluate his medical record. We are also working with the Department of Corrections to obtain their permission to take photographs of Mr. Maldonado's medical condition so that we can provide them to and obtain a more informed opinion from the dermatologist.

We believe that additional time to work on these matters is important for us to provide Mr. Maldonado with adequate legal representation. As a result, we are requesting one additional

Dechert  
LLP

The Honorable Lois Bloom  
August 16, 2016  
Page 2

30-day extension of the deadline for filing an Amended Complaint, which would extend the deadline to September 18, 2016.

Respectfully,



John Biancamano

cc: All counsel (via ECF)